

EXHIBIT C

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8 **UNITED STATES DISTRICT COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

10 LEPRINO FOODS COMPANY;
11 LEPRINO FOODS HEALTH &
WELFARE PLAN,

12 Plaintiffs,

13 v.

14 AVANI OUTPATIENT SURGICAL
15 CENTER, INC., a California
Corporation; MOUNTAIN VIEW
16 SURGICAL CENTER, INC., a
California Corporation; THE CENTER
17 FOR SURGERY AT BEDFORD, LLC,
a California limited liability company;
18 AMY ZARAGOZA, an individual;
19 BABAK MOEINOLMOLKI, an
individual; BEHNAM KASHANCHI,
20 an individual; SAMUEL KASHANI, an
individual; SHERVIN AMINPOUR, an
21 individual; RALPH MAYER, an
individual; MICHAEL YADEGARI, an
22 individual; KARAPET
23 DERMENDJIAN, an individual;
24 SEPEHR LALEZARI, an individual;
MARIO ROSENBERG, an individual;
25 PEYMAN SOLIEMANZADEH, an
individual; and DOES 1-30,

26 Defendants.

27
28 **AND RELATED COUNTERCLAIMS.**

Case No. 2:22-cv-07434 DSF (JC)

**PLAINTIFFS LEPRINO FOODS
COMPANY AND LEPRINO FOODS
HEALTH & WELFARE PLAN'S
FIRST SET OF
INTERROGATORIES TO
DEFENDANTS MOJGAN
KASHANCHI, INDIVIDUALLY,
AND AS ADMINISTRATOR OF
DEFENDANT BEHNAM
KASHANCHI'S ESTATE, AS
TRUSTEE OF THE BEHNAM
KASHANCHI & MOJGAN
KASHANCHI REVOCABLE
LIVING TRUST, AND AS
TRUSTEE OF THE KASHANCHI B
& M LIVING TRUST**

Discovery Cutoff: March 13, 2024
Motion Cutoff: April 8, 2024
Trial: August 13, 2024

1 PROPOUNDING PARTY: Plaintiffs Leprino Foods Company & Leprino Foods
2 Health & Welfare Plan

3 RESPONDING PARTY: Defendants Mojgan Kashanchi, individually, and as
4 Administrator of Behnam Kashanchi's Estate,
5 Trustee of The Behnam Kashanchi & Mojgan
6 Kashanchi Revocable Living Trust, and Trustee of
7 the Kashanchi B & M Living Trust

8 SET NO.: One

9 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiffs
10 LEPRINO FOODS COMPANY and LEPRINO FOODS HEALTH & WELFARE
11 PLAN (collectively, "LEPRINO") propound the First Set of Interrogatories on
12 Defendants MOJGAN KASHANCHI, individually, and as Administrator of
13 Defendant Behnam Kashanchi's Estate, as Trustee of The Behnam Kashanchi &
14 Mojgan Kashanchi Revocable Living Trust, and as Trustee of the Kashanchi B & M
15 Living Trust (the "KASHANCHI PARTIES"), as specified below.

16 **DEFINITIONS**

- 17 1. "ASSET(S)" means any real or personal property.
- 18 2. The "KASHANCHI ESTATE" means Defendant Behnam Kashanchi's
19 Estate, currently pending in Los Angeles Superior Court, Case No. 23STPB04637.
- 20 3. "KASHANCHI LIVING TRUST" means The Behnam Kashanchi &
21 Mojgan Kashanchi Revocable Living Trust.
- 22 4. "B & M LIVING TRUST" means the Kashanchi B & M Living Trust, a
23 revocable trust.
- 24 5. "INDIVIDUAL" means YOUR capacity as a natural person.
- 25 6. "DR. KASANCHI" means Defendant Behnam Kashanchi.
- 26 7. "SURVIVING SPOUSE" means YOUR capacity as the person to whom
27 DR. KASHANCHI was legally married at the time of his death and who survived DR.
28 KASHANCHI.

1 8. "PERSON(S)" includes any natural person, firm, association,
2 organization, partnership, business, trust, corporation, governmental or public entity or
3 any other form of legal entity.

4 9. "YOU" and "YOUR" means the KASHANCHI PARTIES, including
5 employees, agents, officers, representatives, and PERSONS acting on their behalf.

6 10. "IDENTIFY" as used herein with respect to real property means to state
7 the complete address of that property including the house number, city, state, and zip
8 code.

9 "IDENTIFY" as used herein with respect to personal property means to
10 provide a full description, the present location of that property, and, if applicable, the
11 name of the financial institution and account number where the property is deposited
12 or held.

13 "IDENTIFY" as used herein with respect to "PERSON" shall mean to
14 state the full name, title, address, phone number, and email of the PERSON.

15 **INTERROGATORIES**

16 **INTERROGATORY NO. 1:**

17 IDENTIFY all ASSETS that YOU inherited as a result of the death of DR.
18 KASHANCHI as a SURVIVING SPOUSE.

19 **INTERROGATORY NO. 2:**

20 For all ASSETS identified in YOUR response to Interrogatory No. 1, state
21 how those ASSETS are titled as of the date of answering this Interrogatory.

22 **INTERROGATORY NO. 3:**

23 IDENTIFY all ASSETS that YOU inherited as a result of the death of DR.
24 KASHANCHI as an INDIVIDUAL.

25 **INTERROGATORY NO. 4:**

26 For all ASSETS identified in YOUR response to Interrogatory No. 3, state
27 how those ASSETS are titled as of the date of answering this Interrogatory.

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1 **INTERROGATORY NO. 5:**

2 IDENTIFY all ASSETS administered by YOU in YOUR capacity as
3 Administrator of the KASHANCHI ESTATE.

4 **INTERROGATORY NO. 6:**

5 For all ASSETS identified in YOUR response to Interrogatory No. 5, state
6 how those ASSETS are titled as of the date of answering this Interrogatory.

7 **INTERROGATORY NO. 7:**

8 IDENTIFY all ASSETS that were held in the KASHANCHI LIVING
9 TRUST as of the date of DR. KASHANCHI's death.

10 **INTERROGATORY NO. 8:**

11 IDENTIFY all ASSETS that were held in the B & M LIVING TRUST as of
12 the date of DR. KASHANCHI's death.

13 **INTERROGATORY NO. 9:**

14 IDENTIFY all ASSETS titled in the name of DR. KASHANCHI, in whole or
15 in part, on the date of his death.

16 **INTERROGATORY NO. 10:**

17 For all ASSETS identified in YOUR response to Interrogatory No. 9, state
18 how those ASSETS are titled as of the date of answering this Interrogatory.

19 **INTERROGATORY NO. 11:**

20 Was title to any of the ASSETS identified in YOUR response to Interrogatory
21 No. 9 changed after the time of DR. KASHANCHI's death?

22 **INTERROGATORY NO. 12:**

23 If YOUR response to Interrogatory No. 11 is affirmative, IDENTIFY each
24 ASSET.

25 **INTERROGATORY NO. 13:**

26 If YOUR response to Interrogatory No. 11 is affirmative, IDENTIFY each
27 PERSON to whom the ASSET(s) were transferred.

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INTERROGATORY NO. 14:

For each ASSET identified in YOUR response to Interrogatory No. 12, state how those ASSETS are titled as of the date of answering this Interrogatory.

INTERROGATORY NO. 15:

If YOUR response to Interrogatory No. 11 is not affirmative, state all facts that support YOUR response.

INTERROGATORY NO. 16:

IDENTIFY all PERSONS with personal knowledge of the facts YOU provided in response to Interrogatory No. 15.

INTERROGATORY NO. 17:

IDENTIFY all DOCUMENTS that support the facts YOU provided in response to Interrogatory No. 15.

DATED: November 3, 2023

HANSON BRIDGETT LLP

By: 

KATHERINE A. BOWLES

Attorney for Leprino Foods Company,
Leprino Foods Health & Welfare Plan

PROOF OF SERVICE

**Leprino Foods Company, et al., v. Avani Outpatient Surgical Center, et al.
U.S.D.C. Central District of CA, Case No. 2:22-cv-07434 DSF (JC)**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of . My business address is 777 S. Figueroa Street, Suite 4200, Los Angeles, CA 90017.

On November 3, 2023, I served true copies of the following document(s) described as **PLAINTIFFS LEPRINO FOODS COMPANY AND LEPRINO FOODS HEALTH & WELFARE PLAN'S FIRST SET OF INTERROGATORIES TO DEFENDANTS MOJGAN KASHANCHI, INDIVIDUALLY, AND AS ADMINISTRATOR OF DEFENDANT BEHNAM KASHANCHI'S ESTATE, AS TRUSTEE OF THE BEHNAM KASHANCHI & MOJGAN KASHANCHI REVOCABLE LIVING TRUST, AND AS TRUSTEE OF THE KASHANCHI B & M LIVING TRUST** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address sabrignani@hansonbridgett.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on November 3, 2023, at Los Angeles, California.

/s/ Silvia Abrignani
Silvia Abrignani

SERVICE LIST

**Leprino Foods Company, et al., v. Avani Outpatient Surgical Center, et al.
U.S.D.C. Central District of CA, Case No. 2:22-cv-07434 DSF (JC)**

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[Note: Updated April 2023]

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